FCC Part 15 Subpart J

Requesting: Low power electronic products that are battery powered and not intentional radiators should not be required meeting existing FCC Part 15 requirements.

- Cost-benefit considerations
    - Low power devices that are battery powered and are not intentional radiators should not be required to meet FCC Part 15, Subpart J requirements. Additional upfront costs discourage small companies/individuals from developing new products.
- Experience gained from the implementation of the rule
    - In my career designing many electronic products for broadcast television/editing, store and forward telecommunications equipment, LED test systems, audio annunciators, highway traffic sensors, and more… I have taken many products through FCC part 15 certification. In these cases the company I worked for paid the cost of testing and reports. As a consultant I could have designed and manufactured products that would meet the small size battery powered devices for soil testing, bacteria detection on fruits and vegetables, test equipment, measurement devices and more. Wanting to be able to test the markets with minimal investment I would spend my own time in development but then to add testing costs of thousands of dollars before being able to market the product is very discouraging.
- Marketplace and technological changes
    - When the rule was adopted single sided or two layer pcbs were common. Now multilayer pcbs are common. The difference is that multilayer boards can be quieter than a similar design that is two sided. Also, SMT tends to keep trace lengths short and optimizing impedances can reduce unwanted radiation. Additionally the use of very low power and if the application allow variable clock rates would reduce even farther any unwanted radiation.
- Regulation as barrier to entry to the communications marketplace
    - For low cost/custom electronics for commercial/industrial/hobbyist use additional upfront costs are a deterrent.
- Changes in the broader regulatory context
    - When considering a low power battery powered device the amount of energy available as unwanted radiation is limited.
- Changes in, or other implications of, the governing legal framework
- Other considerations relevant to the retrospective review of Commission rules

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